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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

B.S. vs. Uber Technologies, Inc., et al; 3:24-cv-06948

**MOTION TO WITHDRAW AS COUNSEL
OF RECORD**

Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel of record for Plaintiff B.S. (“Counsel”), respectfully moves this Court for an Order allowing his firm to withdraw as counsel of record in the above-captioned matter.

Over the past several months, Plaintiff B.S. has failed to respond to Counsel’s numerous communication attempts via telephone, email, and text. Counsel has made no less than fifty communication attempts to Plaintiff since filing her Short Form Complaint in early October 2024. On January 10, 2025, Counsel advised Plaintiff in writing of their intent to withdraw from this matter via electronic mail if she did not respond by January 21, 2025. Counsel finally spoke with Plaintiff on January 16 by phone, but the call disconnected, and Plaintiff has not replied to Counsel’s follow-up attempts. Counsel advised Defendants of their intent to withdraw from this

1 matter during a meet and confer conference on December 23, 2024 regarding Magistrate
2 Cisneros' fact sheet deadline.

3 WHEREFORE, the law firm of Pulaski Kherkher, PLLC; and all attorneys of record for
4 Plaintiff request that they be allowed to withdraw as counsel of record for Plaintiff B.S. A copy
5 of this motion will be served upon Plaintiff at her last known address and via electronic mail.
6

7 Dated: January 21, 2025

Respectfully submitted,

8 **PULASKI KHERKHER, PLLC**

9 /s/ D. Douglas Grubbs

10 D. Douglas Grubbs (TX Bar No. 24065339)

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19 Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2025, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: MDL3084-service-Uber@paulweiss.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs